



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866**

**AUG 31 2007**

Mr. Steve Kelley  
Federal Aviation Administration  
National Airspace Redesign  
c/o Nessa Memberg  
12005 Sunrise Valley Drive, MS C3.02  
Reston, VA 20191

Dear Mr. Kelley:

The **Environmental Protection Agency (EPA)** has reviewed the final environmental impact statement (**FEIS**) for the **New York/New Jersey/Philadelphia (NY/NJ/PHL)** Metropolitan Area Airspace Redesign (**CEQ # 20070324**) which encompasses the entire state of New Jersey and portions of New York, Connecticut, Delaware and **Pennsylvania**. The Study Area comprises approximately 31,180 square miles and encompasses all or portions of 64 counties, and hundreds of municipalities. This review **was** conducted in accordance with Section 309 of the Clean Air Act, as amended (42 **U.S.C.** 7609, PL **91-604 12(a)**, 84 Stat. 1709), and the National Environmental Policy Act (**NEPA**).

**Project and Alternatives:**

The stated purpose of the project is to increase the **efficiency** and reliability of the airspace structure and Air Traffic Control (ATC) system by making modifications to aircraft routes and air traffic control procedures used in the **NY/NJ/PHL** Metropolitan Region. In addition to the No Action Alternative, the DEIS analyzes three other alternatives: the Modifications to Existing Airspace Alternative, the Ocean Routing Airspace Alternative, and the Integrated Airspace Alternative (with and without an Integrated Control Complex).

In March 2007, the FAA chose the Integrated Airspace Design with an Integrated Control Complex as the preferred alternative, and released a noise mitigation report on that alternative in April 2007. FAA held several public hearings on its noise mitigation report, and comments were accepted until May 11, 2007.

EPA commends the FAA for its commitment to assuring public participation in the NEPA process for the **NY/NJ/PHL** Metropolitan Area Airspace Redesign. Given the complexity of this project, numerous public hearings during all phases of the process were certainly warranted; FAA aptly met this challenge. Also, the longer comment period on the draft EIS was important for the public to be able to review the document thoroughly.

While we understand the FAA's position that this project does not increase capacity at the airports, EPA is still concerned that a new airspace design will induce growth at the airports wanting to make use of the increased **efficiency** and reliability of the airspace structure. We are particularly **concerned** about the air quality, noise **and** other impacts this potential growth could have on Environmental Justice areas in the vicinities of the airports. As such, we request that the FAA keep us informed of any airport expansions or redesigns, because EPA would like to be involved in any planning and NEPA processes as soon as possible.

Thank you for the opportunity to comment. Should you have any questions concerning this letter, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Filippelli". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

John Filippelli, Chief  
Strategic Planning and Multi-Media Programs Branch